

February 15, 1999

Mr. Larry Gadbois
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, WA 99352



Dear Mr. Gadbois:

RE: Response to Public Comments on Hanford's K Basins M-34 Milestones

Dear Mr. Gadbois:

Thank you for providing response to my comments on the proposed milestones for cleanup of Hanford's K Basins. As I believe your response did not address all of my comments, please find a copy of my comment letter enclosed for your reference. In recognition that my letter should not have included recommendations, but rather requests, I hereby request you accept my November 16, 1998 letter's recommendations as requests. As such, I request that you provide: 1) an acknowledgement of the existence of an assessment plan entitled "Groundwater Monitoring and Assessment Plan for the 100-K Area Fuel Storage Basins," and 2) an answer as to when, or if, the plan will be required to be implemented. Again, my opinion remains unchanged. Considering the omission of actions to address the on-going and alarmingly significant environmental insult to the vadose zone, groundwater, and likely, surface water, it may be concluded that the TPA change control proposal fails to satisfy the most fundamental ARARs.

In addition and in response to your response, I respectfully request the following: 1) a copy of all documentation of the "extensive discussions" which address inclusion of the vadose, groundwater, and/or surface water characterization and/or remediation in the workscope of the change package and 2) a copy of all documentation identifying the "cons" of addressing the above referenced on-going and alarmingly significant environmental insult to the vadose zone, groundwater, and likely, surface water in this milestone change package

Lastly, for clarification purposes, I request to better understand your response in relation to when the gross environmental insult to the groundwater, vadose zone, and surface water will be addressed. Your response identifies that only after the actions included in this milestone change package are completed and then those actions necessary to achieve deactivation and stabilization of facilities will remediation of "all 100 Area sites" be implemented. I request that you provide an estimated year of implementation. I interpret your answer to indicate that the grossly contaminated vadose zone, groundwater, and surface water will not be addressed for many years to come. I am adamantly opposed to this prioritization of activities. I respectfully request an acknowledgement that the gross vadose and groundwater contamination is currently impacting what many define as "the Hanford Reach". In summary, your statutory duties to protect the environment are not satisfied by TPA Milestone M-34.

If you have any questions about my letters, please contact me at the address and/or number below.

Sincerely,



Alisa D. Huckaby
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Richland, WA 99352
509/627-1162

enclosure: copy of November 16, 1998 letter

cc w/out enclosure: Chuck Clarke, Region X, EPA
Tom Fitzsimmons, Department of Ecology
John Wagoner, USDOE Richland Operation Office
Hanford Site Administrative Record, H6-08

cc w/ enclosure: Honorable Christine Gregoire
Governor Mike Locke
Senator Patty Murray

